

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

XIANHUA ZHANG

Plaintiff,

v.

ING DIRECT

Defendant.

Case No. 07-555

RULE 7.1(a) DISCLOSURE STATEMENT OF DEFENDANT ING BANK, FSB

Pursuant to Federal Rule of Civil Procedure 7.1(a) Defendant ING Bank, fsb (“ING Bank”), by and through its undersigned attorneys, hereby states that ING Bank is owned 100% by its parent, ING Direct Bancorp. ING Direct Bancorp’s ultimate parent is ING Groep NV, which is publicly held.

Dated: January 7, 2008

/s/ David P. Primack
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CERTIFICATION OF SERVICE

I, David P. Primack, do hereby certify that, on this date, two true and correct copies of ING Bank, fsb's Rule 7.1 Disclosure Statement were timely served by first class mail, postage prepaid, upon the following:

Xianhua Zhang
212 Yorktown Court
Malvern, PA 19355

Dated: January 7, 2008

/s/ David P. Primack
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